

Kenneth S. Marks
Jonathan J. Ross
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-5096
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
kmarks@susmangodfrey.com
jross@susmangodfrey.com

*Attorneys for plaintiff Alfred H. Siegel, solely
in his capacity as Trustee of the Circuit City
Stores, Inc. Liquidating Trust*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. 3:07-CV-5944-SC

MDL No. 1917

This Document Relates to:

All Indirect Purchaser Actions;

*Best Buy Co., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513;*

*Best Buy Co., et al. v. Technicolor SA, et al.,
No. 13-cv-05264;*

*Sears, Roebuck and Co. and Kmart Corp. v.
Technicolor SA, No. 13-cv-05262;*

*Sears, Roebuck and Co. and Kmart Corp. v.
Chunghwa Picture tubes, Ltd., No. 11-cv-
05514;*

*Sharp Electronics Corp. v. Hitachi, Ltd., No.
13-cv-01173;*

*Sharp Electronics Corp. v. Koninklijke
Philips Electronics, N.V., et al., No. 13-cv-
02776;*

*Siegel v. Hitachi, Ltd., et al., No. 11-cv-
05502;*

*Siegel v. Technicolor SA, et al., No. 13-cv-
05261;*

*Target Corp. v. Chunghwa Picture Tubes,
Ltd., et al., No. 13-cv-05514;*

**DECLARATION OF JONATHAN J.
ROSS IN SUPPORT OF DIRECT
ACTION PLAINTIFFS' RESPONSE IN
OPPOSITION TO DEFENDANTS'
MOTION IN LIMINE NO. 12 [D.E. 3568]**

Judge: The Honorable Samuel Conti
Court: Courtroom No. 1, 17th Floor
Date: None Set

1 *Target Corp. v. Technicolor SA, et al.*, No.
2 13-cv-05686;

3 *Viewsonic Corp. v. Chunghwa Picture*
4 *Tubes, Ltd.*, No. 14-cv-02510.

5 I, Jonathan J. Ross, hereby declare as follows:

6 1. I am an attorney with the law firm of Susman Godfrey L.L.P., counsel for
7 Plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust. I submit
8 this declaration in support of Direct Action Plaintiffs' Response in Opposition to defendants'
9 Motion in Limine No. 12. Except as to those matters based on information and belief, which I
10 believe to be true, I have personal knowledge of the facts stated herein, and could and would
11 competently testify thereto if called as a witness.

12 2. Attached hereto as Exhibit A is a true and correct copy of Deposition Testimony
13 of C.C. Liu, dated February 20, 2013.

14 3. Attached hereto as Exhibit B is a true and correct copy of CHU00028768.01 –
15 CHU00028770, marked at deposition in this case as Ex. 1229, dated January 28, 1997.

16 4. Attached hereto as Exhibit C is a true and correct copy of CHU00029235 –
17 CHU00029237, marked at deposition in this case as Ex. 1142, dated April 15, 1999.

18 5. Attached hereto as Exhibit D is a true and correct copy of MTPD-0303225 –
19 MTPD-0303228, marked at deposition in this case as Ex. 2019, dated August, 2005

20 6. Attached hereto as Exhibit E is a true and correct copy of SDCRT-0002520 –
21 SDCRT-0002522, dated March, 2001.

22 7. Attached hereto as Exhibit F is a true and correct copy of CHU00029131 –
23 CHU00029137, marked at deposition in this case as Ex. 710, dated May 25, 2000.

24 8. Attached hereto as Exhibit G is a true and correct copy of CHU00029171 –
25 CHU00029174, dated October 27, 1999.

26 I declare under penalty of perjury that the foregoing is true and correct.
27
28

Executed this 27th day of February, 2015, at Houston, Texas.

/s/ Jonathan J. Ross

Jonathan J. Ross